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 12
 13 UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

14 Emine Sahin,

15 Petitioner,

16 v.

17 Reggie Rader, Henderson Chief of Police;
 18 Michael Bernacke, Field Director, West
 Valley City Office of ICE ERO; Todd
 19 Lyons, ICE Acting Director; Kristi Noem
 DHS Secretary; Pam Bondi, U.S. Attorney
 20 General, et al.,

21 Respondents.

Case No.

**PETITION FOR WRIT OF HABEAS
CORPUS UNDER 28 U.S.C. §2241**

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1 **INTRODUCTION**

2 Emine Sahin is a Turkish asylum-seeker who has been detained at the
3 Henderson Detention Center for the past four months. She is also 23-weeks
4 pregnant and is being denied basic and essential prenatal care by ICE, who also
5 refuses to release her in compliance with ICE’s own policy which favors the release
6 of pregnant women. She also seeks the opportunity for release on bond in
7 accordance with the Immigration and Nationality Act. ICE’s unlawful behavior has
8 already placed Sahin and her unborn child at risk of serious adverse health
9 consequences. The risks continue to grow with each additional day of detention.
10 This Court should grant the petition and order Sahin’s release or, at minimum, a
11 bond hearing in immigration court.

12 **JURISDICTION AND VENUE**

13 This Court has jurisdiction pursuant to 28 U.S.C. §2241 (granting general
14 habeas authority to district courts); Art. 1 § 9, cl. 2 of the U.S. Constitution (the
15 “Suspension Clause”); 28 U.S.C. §1331 (federal question jurisdiction); and 28 U.S.C.
16 § 2201, 2202 (Declaratory Judgment Act).

17 Federal district courts have jurisdiction to hear habeas claims by non-citizens
18 challenging the lawfulness of their detention. *See e.g. Zadvydas v. Davis*, 533 U.S.
19 678 (2001). Federal courts also have federal question jurisdiction, through the APA
20 to “hold unlawful and set aside agency action” that is “arbitrary, capricious, an
21 abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A).
22 APA claims are cognizable in habeas. 5 U.S.C. § 703. The APA affords a right of
23 review to a person who is “adversely affected or aggrieved by agency action.” 5
24 U.S.C. § 702. Petitioner’s continued detention violates her constitutional due
25 process rights, constitutes arbitrary and capricious agency action, and is an abuse of
26 discretion.

1 Venue is proper in this district pursuant to 28 U.S.C. § 2241(c)(3) and 28
2 U.S.C. § 1391(b)(2) and (e)(1) because Petitioner is detained within this district at
3 the Henderson Detention Center.

4 Accordingly, Petitioner's habeas petition is properly before this court.

5 **PARTIES**

6 Emine Sahin is a native of Turkey who is currently detained at the
7 Henderson Detention Center in Henderson, Nevada.

8 Reggie Rader is the Henderson Chief of Police who oversees the Henderson
9 Detention Center. Rader, in his official capacity, is the immediate custodian of
10 Sahin.

11 Michael Bernacke is the Field Director of the West Valley City Office of
12 Immigration and Customs Enforcement (ICE) Enforcement and Removal
13 Operations, which has jurisdiction of enforcement and removal operations over
14 detention facilities in Nevada, including Nevada Southern Detention Center where
15 Sahin is detained. Bernacke, in his official capacity, is a legal custodian of Sahin.

16 Todd Lyons is the Acting Director of Immigration and Customs Enforcement,
17 which is responsible for administering and enforcing immigration laws, including
18 the detention and removal of immigrants. Lyons, in his official capacity, is a legal
19 custodian of Sahin.

20 Kristi Noem is the Secretary of the Department of Homeland Security (DHS),
21 which oversees ICE. Noem, in her official capacity, is the ultimate legal custodian of
22 Sahin.

23 Pam Bondi is the Attorney General of the United States. She oversees the
24 immigration court system, which is housed within the Executive Office for
25 Immigration Review (EOIR) and includes all immigration courts and the Board of
26 Immigration Appeals (BIA). She is named in her official capacity.

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1 Shortly after getting detained, Sahin discovered she was pregnant. Sahin
2 recently lost a pregnancy in June of 2025. She went to the emergency room and was
3 diagnosed with [REDACTED]

4 [REDACTED]
5 [REDACTED]
6 any future pregnancies would be high-risk.¹¹ ICE has been made aware of Sahin’s
7 high-risk pregnancy and related medical needs but has failed to provide her with
8 basic prenatal care.¹² Sahin has been denied prenatal care to include important and
9 routine fetal development scans, a special diet related to her specific nutritional
10 needs related to pregnancy, and prenatal monitoring.¹³ Sahin suffers from
11 dangerously low blood pressure, morning sickness, and she has lost a significant
12 amount of weight.¹⁴ Sahin’s immigration attorneys sought to have ICE release
13 Sahin on parole due to these concerns and others,¹⁵ but ICE has refused,
14 necessitating this case.

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16 ⁸ Ashley Redinger, Hao Nguyen, *Incomplete Miscarriage*, NATIONAL LIBRARY
17 OF MEDICINE. NATIONAL CENTER FOR BIOTECHNOLOGY INFORMATION,
18 <https://www.ncbi.nlm.nih.gov/books/NBK559071/> Feb. 12, 2024) (“Incomplete
19 pregnancy loss, also known as incomplete miscarriage or incomplete abortion, is the
20 partial loss of products of conception within the first 20 weeks of gestation.
21 Incomplete miscarriage presents with moderate to severe vaginal bleeding,
22 sometimes with the noticeable passage of tissue, that is typically associated with
23 lower abdominal and pelvic pain. . . Proper diagnosis and treatment with close
24 obstetric follow-up and patient education are essential to prevent serious
25 complications.”).

22 ⁹ Ex. 5.

23 ¹⁰ Ex. 5.

24 ¹¹ Ex. 26.

25 ¹² Exs. 10, 11, 13, 14, 20, 21, 22, 24, 25.

26 ¹³ Ex. 26.

27 ¹⁴ Ex. 26.

¹⁵ Exs. 10, 11.

LEGAL FRAMEWORK

I. Constitutional guarantee to medical care

The Fifth Amendment guarantees individuals in civil detention are not subject to conditions of confinement or the denial of medical care that “amount to punishment.” *Bell v. Wolfish*, 441 U.S. 520, 535 (1979). The federal government violates a detained individual’s substantive due process rights if it “takes [that] person into custody, severely limiting his ability to care for himself, and then is deliberately indifferent to his medical needs.” *Charles v. Orange Cnty.*, 925 F.3d 73, 85 (2d Cir. 2019); *see also Helling v. McKinney*, 509 U.S. 25, 32 (1993) (“[W]hen the State by the affirmative exercise of its power so retrains an individual’s liberty that it renders him unable to care for himself, and at the same time fails to provide for his basic human needs—e.g., . . . medical care and reasonable safety—it transgresses the substantive limits on state action set by the Eighth Amendment.”). A court’s intervention is warranted where conditions put the life of a detained individual at risk. *See Basank v. Decker*, 449 F. Supp 3d 205, 210 (S.D.N.Y. 2020) (ordering the release of detained migrants with chronic medical conditions whose health was worsened by detention conditions and viral illnesses).

II. The Administrative Procedures Act mandates that a federal agency comply with existing regulations and policies.

The APA provides that a court shall “hold unlawful and set aside agency action . . . found to be . . . arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A). When the government has promulgated “[r]egulations with the force and effect of law,” those regulations “supplement the bare bones” of federal statutes, such that the agencies are bound to follow their own “existing valid regulations.” *United States ex rel. Accardi*

1 *Shaugnessy*, 347 U.S. 260, 266, 268 (1954). The *Accardi* doctrine additionally
2 obligates agencies to comply with procedures outlined in their own manuals. *See*
3 *Morton v. Ruiz*, 415 U.S. 199, 235 (1974) (finding that an agency is obligated to
4 comply with the procedural rules outlined in its internal manual). Pursuant to the
5 *Accardi* doctrine, courts may set aside agency actions that are not in compliance
6 with their own regulations or internal procedures. *See Lesli v. Att’y Gen. of U.S.*, 611
7 F.3d 171, 175 (3d Cir. 2010).

9 **III. ICE Policies Concerning the Detention of Pregnant Women**

10 ICE Directive 11032.4 sets forth ICE’s policy for the identification and
11 monitoring of pregnant, postpartum, or nursing individuals. The policy states that
12 “ICE should not detain, arrest, or take into custody for an administrative violation
13 of the immigration laws individuals known to be pregnant . . . unless release is
14 prohibited by law or exceptional circumstances exist.” *Id.* at ¶ 1. The policy
15 contemplates that pregnant individuals should only be detained in “very limited
16 circumstances.” *Id.* The policy defines “exceptional circumstances” in two specific
17 cases—“(1) the individual poses national security concerns; or (2) the individual
18 poses an imminent risk of death, violence, or physical harm to any individual.” *Id.*
19 at ¶ 3.4.

22 Although not appropriate here because detention is not warranted, the policy
23 notes that when detention is “necessary and appropriate, ICE must monitor
24 individuals known to be pregnant . . . for general health and well-being, including
25 regular custody and medical reevaluation to ensure appropriate pre[natal and
26 other medical and mental health care.” *Id.* If an individual is found to be pregnant
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1 in ICE custody, ICE is required to immediately notify their chain of command and
2 appropriate medical staff “to determine if continued detention is appropriate.” *Id.* at
3 ¶ 2.1.

4 As the Field Office Director, Michael Bernacke, is responsible for ensuring
5 that pregnant individuals are released from detention. *Id.* at ¶ 5.1. Director
6 Bernacke is also required to evaluate weekly whether a pregnant individual should
7 remain in custody. ICE personnel themselves are also responsible for ensuring that
8 pregnant individuals are not detained. *Id.* at ¶ 4.5(1).

10 GROUND FOR RELIEF

11 I. **Ground One: The continued detention of Emine Sahin violates her 12 Fifth Amendment right to due process because ICE’s denial of 13 medical care amounts to a punishment.**

14 Petitioner incorporates the above paragraphs by reference as if fully set forth
15 herein.

16 The Fifth Amendment guarantees detainees are not denied medical care and
17 are not subject to conditions that “amount to punishment.” *Bell*, 441 U.S. at 535.

18 The federal government may not detain an individual and then deny that person
19 medical care through their deliberate indifference. *Charles*, 925 F.3d at 85.

20 Deliberate indifference “involves culpable recklessness, i.e., an act or a failure to act
21 that evinces a conscious disregard of a substantial risk of serious harm.” *Id.* at 87
22 (quoting *Cuoco v. Moritsugu*, 222 F.3d 99, 107) (2d Cir. 2000) (cleaned up).

23 Sahin is approximately 23 weeks pregnant, yet ICE has failed to provide
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1 her with medical care.¹⁶ Since being in ICE custody, Sahin has been denied prenatal
2 care, she has not had any prenatal check-ups, professional evaluations, or medical
3 testing, despite being in her second trimester of pregnancy.¹⁷ A detailed anatomy
4 ultrasound should have been, but was not, performed between Sahin's 18th and
5 22nd week of gestation.¹⁸ The purpose of this ultrasound is to check the
6 development of fetal organs and body parts.¹⁹ During this scan, congenital
7 conditions can be detected.²⁰ The failure to provide Sahin with prenatal care
8 amounts to deliberate indifference that can lead to a serious risk to both Sahin and
9 the fetus. Sahin's case is exceptionally urgent as her pregnancy is high-risk and she
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13 In addition to failing to provide Sahin prenatal care, ICE has not
14 provided her proper nutrition. Sahin is Muslim and therefore does not eat pork.²²
15 Despite informing ICE that she requires a special diet, ICE has ignored her needs.²³
16 The stress of her continued detention and the inadequate nutrition being provided
17 to her has resulted in Sahin losing weight.²⁴ The failure to provide Sahin with
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20 ¹⁶ See Exs. 13, 14, 20, 21, 22, 24, 25, 26.

21 ¹⁷ *Id.*

22 ¹⁸ See Ex. 4.

23 ¹⁹ *Id.*

24 ²⁰ *Id.*

25 ²¹ See Exs. 5, 10 at 3, 13, 26.

26 ²² Ex. 26.

27 ²³ *Id.*

²⁴ *Id.*

1 proper nutrition amounts to deliberate indifference that can lead to a serious risk to
2 both Sahin and her fetus.

3 ICE's failure to provide adequate medical care to detainees is well
4 documented. On September 18, 2025, twenty-nine United States Senators,
5 including both Nevada Senators Catherine Cortez Masto and Jacky Rosen, sent
6 Secretary Noem a letter urging ICE to follow its own policy and cease detaining
7 pregnant, postpartum, and nursing women absent exceptional circumstances.²⁵ The
8 Senators noted that medical research has linked ICE detention to high rates of
9 pregnancy complications.²⁶ These studies note serious risks to both fetal and
10 maternal health.²⁷ Of note, conditions at detention centers have been worsening due
11 to "deteriorating conditions inside detention facilities, including severe
12 overcrowding, reports of inadequate food and water, and lack of emergency medical
13 care."²⁸

14 When the Senate Judiciary Committee Staff visited an ICE Processing
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20 ²⁵ Ex. 6.

21 ²⁶ *Id.* at 1 (Annette Decker, MD, MS, et al., "Emergency Medical Responses at
22 U.S. Immigration and Customs Enforcement Detention Centers in California,"
23 *Journal of the American Medical Association*, 6, no. 11 (2023), available at
24 <https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2812358>; Physicians
25 for Human Rights, "Health and Harms Experienced by Pregnant Women in U.S.
26 Immigration Custody," *Physicians of Human Rights* (2019), available at
27 [https://phr.org/wp-content/uploads/2019/12/PHR-Pregnant-Women-in-Immigration-
Custody-Fact-Sheet-Nov-2019.pdf](https://phr.org/wp-content/uploads/2019/12/PHR-Pregnant-Women-in-Immigration-Custody-Fact-Sheet-Nov-2019.pdf) (hereinafter Health and Harms)); *see also* Ex. 12.

²⁷ Ex. 6 at 1.

²⁸ *Id.* (citing Miriam Jordan and Jazmine Ulloa, "Concerns Grow Over Dire
Conditions in Immigrant Detention," *New York Times*, June 28, 2025).

1 Center in Basile, Louisiana, they found fourteen pregnant women.²⁹ The detained
2 women reported that they received “little to no medical care and insufficient
3 nutrition; some reported having never been seen by a physician in the facility,
4 despite efforts to get care.”³⁰ The report included an anecdote about “a pregnant
5 women who had a miscarriage while detained and was allegedly still bleeding when
6 she was deported.”³¹ Physicians for Human Rights has also noted the lack of
7 medical care for pregnant women by ICE and the high number of miscarriages
8 experienced by ICE detainees.³²

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11 On November 19, 2025, members of the Democratic Women’s Caucus and
12 House Democratic Caucus sent a similar letter to Acting Director Lyons.³³ The
13 letter notes Congress members “have continued to receive numerous reports of
14 pregnant women who have been detained under unacceptable treatment without
15 clear exceptional circumstances.”³⁴ At detention centers, there are reports of
16 pregnant women being shackled, locked in restraints, or placed in solitary
17 confinement.³⁵ These women are also being deprived of “prenatal, pregnancy,
18 postpartum, lactation, and miscarriage care, as well as interpretative services, and
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22 ²⁹ *Id.* at 2.

23 ³⁰ *Id.*

24 ³¹ *Id.*

25 ³² Ex. 1

26 ³³ Ex. 18.

27 ³⁴ *Id.* at ¶ 1.

³⁵ *Id.*

1 informed consent for medical services and procedures.”³⁶ The caucuses urged ICE to
2 follow their own regulations because “[b]y detaining vulnerable women in appalling
3 conditions while pregnant, you are subjecting both the pregnant individual and the
4 pregnancy to significant risks and possible death.”³⁷

5
6 Based on the reported conditions at detention centers and her own reports, it
7 is clear Sahin is being denied her due process rights. ICE is violating Sahin’s Fifth
8 Amendment guarantees by refusing to provide Sahin with her medical and
9 nutritional needs. Sahin must be immediately released.

10
11 **II. Ground Two: ICE’s continued detention of Emine Sahin is in**
12 **violation of governing ICE policy concerning the detention of**
13 **pregnant women mandating her release under the Administrative**
14 **Procedures Act.**

15 ICE Directive 11032.4 applies to pregnant individuals detained in ICE
16 custody. The Directive prohibits the detention of pregnant individuals, unless
17 “prohibited by law or exceptional circumstances exist.” *Id.* at ¶ 1. The policy clearly
18 defines the only exceptional circumstances in which ICE can detain a pregnant
19 individual—“(1) the individual poses national security concerns; or (2) the
20 individual poses an imminent risk of death, violence, or physical harm to any
21 individual.” *Id.* at ¶ 3.4.

22 As explained above, Section II (Legal Framework), ICE is required to follow
23 its own regulations and directives, and this court may review a detention decision
24 for compliance with the regulations.

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26 ³⁶ *Id.*

27 ³⁷ *Id.* at ¶ 3.

1 ICE is not following its own directives and this failure has increased since
2 January 2025 when ICE began rapidly increasing the number of people detained
3 and began detaining individuals who would not have previously been detained.³⁸ In
4 addition to increasing arrests of pregnant women, ICE has increasingly failed to
5 release pregnant individuals. *Id.* at 3.
6

7 The analysis here is simple: according to ICE's own directive, they will not
8 arrest, detain, or keep pregnant individuals in custody. Pursuant to Directive
9 11032.4, Sahin must be released because she is pregnant, her continued detention is
10 not prohibited by law, and she does not meet any exception to her continued
11 detention.
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13 Recently, a court in the Western District of Louisiana found a pregnant ICE
14 detainee's continued detention was not consistent with the *Accardi* doctrine based
15 on Directive 11032.4. *De Leon v. Ladwig*, No. 6:25-cv-01884, 2026 WL 19095, at *8
16 (W.D. La. Jan. 2, 2026). Additionally, numerous courts have released re-detained
17 immigrants after finding that ICE failed to comply with applicable regulations. *See*
18 *e.g. Ghafouri v. Noem, et. al.*, No. 3:25-CV-02675-RBM-BLM, 2025 WL 3085726,
19 (S.D. Cal. Nov. 4, 2025); *Ceesay v. Kurzdorfer*, 781 F. Supp. 3d 137, 166 (W.D.N.Y.
20 2025); *You v. Nielsen*, 321 F. Supp. 3d 451,463 (S.D.N.Y. 2018); *Rombot v. Souza*,
21 296 F. Supp. 3d 383,387 (D. Mass. 2017); *Zhu v. Genalo*, No. 1:25-CV-06523 (JLR),
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26 ³⁸ *See* Ex. 12 at 2 (citing Albert Sun, "Deportations Reach New High After
27 Summer Surge in Immigration Arrests," *New York Times*, Aug. 21, 2025, *available*
at [https://www.nytimes.com/interactive/2025/08/21/us/trump-deportations-summer-
data-immigration-arrests.html](https://www.nytimes.com/interactive/2025/08/21/us/trump-deportations-summer-data-immigration-arrests.html)).

1 2025 WL 2452352, at *7-9 (S.D.N.Y. Aug. 26, 2025); *M.S.L. v. Bostock*, No. 6:25-CV-
2 01204-AA, 2025 WL 2430267, at *10-12 (D. Or. Aug. 21, 2025); *Escalante v. Noem*,
3 No. 9:25-CV-00182-MJT, 2025 WL 2491782, at *2-3 (E.D. Tex. July 18, 2025); *Hoac*
4 *v. Becerra*, No. 2:25-cv-01740-DC-JDP, 2025 WL 1993771, at *4 (E.D. Cal. July 16,
5 2025); *Liu*, 2025 WL 1696526, at *2; *M.Q. v. United States*, 2025 WL 965810, at *3,
6 *5 n.1 (S.D.N.Y. Mar. 31, 2025); *Rokhfirooz v. Larose*, No. 25-CV-2053-RSH-VET,
7 2025 WL 2646165, (S.D. Cal. Sept. 15, 2025).

8
9 Because ICE has not complied with its own regulations and because Sahin's
10 case is so urgent given her pregnancy history and the late stage of her pregnancy,
11 ICE must release Sahin from custody. In denying Sahin's Constitutional rights and
12 defying its own policies, ICE is threatening the health and safety of Sahin. As the
13 Democratic Caucus wrote in their letter to ICE, "[t]he health and safety of pregnant
14 women should not be threatened as a result of the administration choosing not to
15 adhere to Federal regulations."³⁹
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18 **III. Ground Three: ICE's detention of Emine Sahin without the**
19 **opportunity to seek release on bond in immigration court violates**
20 **her procedural due process rights because she is entitled to the**
21 **opportunity to seek release on bond under 8 U.S.C. § 1226(a).**

22 When ICE detained Sahin on September 29, 2025, it indicated that she would
23 be "held in ICE custody without bond."⁴⁰ This is a violation of Sahin's procedural
24 due process rights because she is guaranteed the opportunity to seek release on
25 bond pursuant to 8 U.S.C. § 1226(a). It is clear that Sahin is detained pursuant to
26 section 1226(a), because ICE arrested her nearly two years after she entered the

27 ³⁹ Ex. 18 at ¶ 1.

⁴⁰ I-213 at 4.

1 United States without inspection. Accordingly, she categorically cannot be detained
2 under 8 U.S.C. § 1225 or any other detention authority. As ICE acknowledged when
3 it charged Sahin in the NTA with being present in the United States without
4 admission pursuant to section 212(a)(6)(A)(i) as opposed to charging her as “an
5 arriving alien.”⁴¹

6 ICE recently began arguing that individuals such as Sahin who have not
7 been classified as “arriving aliens” should nevertheless be treated as such and
8 detained under the mandatory detention authority of 8 U.S.C. § 1225(b). The Board
9 of Immigration Appeals later endorsed this irrational statutory interpretation and
10 issued a precedential decision stripping IJs of their ability to grant bond to
11 noncitizens present in the U.S. who entered without inspection. *See Matter of*
12 *Yajure Hurtado*, 29 I&N Dec. 2016 (BIA 2025). “The overwhelming majority of
13 district courts across the country, including this Court, that have considered the
14 government’s new statutory interpretation have found it incorrect and unlawful.” *In*
15 *re Alejandro Pueblas Rojas*, 2026 WL 125152, at *2 (Nev. Jan. 16, 2026). “A
16 nationwide class has also been certified, become final, and granted declaratory relief
17 to all class members, holding that they are being detained without a bond hearing
18 unlawfully.” *Id.* at *1, citing *Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, ---
19 F. Supp. 3d ----, 2025 WL 3713987 (C.D. Cal. Dec. 18, 2025); *Bautista v. Santacruz*,
20 No. 5:25-CV-01873-SSS-BFM, 2025 WL 3289861 (C.D. Cal. Nov. 20, 2025); *Bautista*
21 *v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, 2025 WL 3288403 (C.D. Cal. Nov. 25,
22 2025). Immigration Courts are nevertheless continuing to unlawfully deny bond
23 hearings to individuals like Sahin.⁴² Accordingly, this Court should order that
24 Sahin receive a bond hearing in immigration court or be released.

25
26 ⁴¹ Ex. 2.

27 ⁴² [Practice Alert: EOIR Issues Nationwide Guidance on Maldonado Bautista](#)

PRAYER FOR RELIEF

Accordingly, Emine Sahin respectfully requests that this Court:

1. Declare that Petitioner’s continued detention violates the Immigration and Nationality Act, 8 U.S.C. §1231(a)(6); the Administrative Procedure Act, 5 U.S.C. §706(2)(A); and/or the Due Process Clause of the Fifth Amendment to the U.S. Constitution;

2. Order Petitioner’s immediate release;

3. If release is not ordered, order that Sahin be given a bond hearing in immigration court with the burden of proof on the government to justify detention; and

3. Grant such other and further relief as, in the interests of justice, may be appropriate.

Dated January 21, 2026.

Respectfully submitted,

Rene L. Valladares
Federal Public Defender

/s/ Laura Barrera

Laura Barrera
Assistant Federal Public Defender

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury under the laws of the United States of America and the State of Nevada that the facts alleged in this petition are true and correct to the best of counsel's knowledge, information, and belief.

Dated January 21, 2026.

Respectfully submitted,

Rene L. Valladares
Federal Public Defender

/s/ Megan Hopper-Rebegea
Megan Hopper-Rebegea
Assistant Federal Public Defender

/s/ Laura Barrera
Laura Barrera
Assistant Federal Public Defender

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed on January 21, 2026. I certify that some of the participants in the case are not registered electronic filing system users. I have mailed the foregoing document by First-Class Mail, postage pre-paid, or have dispatched it to a third-party commercial carrier for delivery within three calendar days, to the following person:

Reggie Rader Henderson Chief of Police 223 Lead St. Henderson, NV 89105Sahin	Todd Lyons 500 12th St SW Washington, DC 20536
Pam Bondi Attorney General U.S. Department of Justice 950 Pennsylvania Ave, NW, Washington, DC, 20530	Michael Bernanke Salt Lake City ICE Field Office Director 2975 Decker Lake Drive, Ste 100 West Valley City, UT 841179-6096
Kristi Noem Secretary of the Department of Homeland Security 2707 Martin Luther King Jr. Ave SE, Washington, DC 20528	

/s/ Victoria Lenzi

 An Employee of the
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